



# California Municipal Utilities Association

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October 3, 2014

California Energy Commission  
Dockets Office, MS-4  
Docket No. 11-RPS-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: RPS Implementation – CMUA Comments on the Proposed Process to Allow Creation of Retroactive Renewable Energy Certificates and Extend the Deadline for the Interim Tracking System for the Renewables Portfolio Standard**

The California Municipal Utilities Association (CMUA) would like to thank the California Energy Commission (CEC) for the opportunity to provide these comments in support of the proposed Resolution No. 14-1007-10, which would provide a process to allow for the creation of retroactive Renewable Energy Certificates (RECs) and to extend the deadline for the Interim Tracking System (ITS) for the Renewables Portfolio Standard (RPS) program.

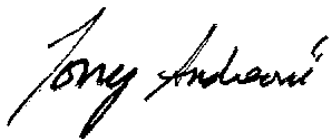
CMUA strongly supports the proposed resolution and believes it is consistent with the goals and purpose of the RPS. As both the Northern California Power Agency (NCPA) the Sacramento Municipal Utility District (SMUD), and the San Francisco Public Utilities Commission (SFPUC) noted in previous comments, extending the deadline for the ITS would allow generation to count towards the RPS that would have been excluded by the October 2012 deadline due to unforeseen registration delays or reasons beyond the control of the POU, while at the same time ensuring that the CEC is able to adequately track and verify this generation. Similarly, creating a process for the CEC to initiate a request for the Western Renewable Energy Generation Information System (WREGIS) to retroactively create RECs will address complexities in the WREGIS registration process without impacting the integrity of the tracking system.

Several of CMUA's members will provide comments on the proposed resolution that recommend certain modifications and clarifications. CMUA supports its members' comments and in particular requests that the CEC consider: (1) eliminating the ITS restriction for aggregated generating facilities; (2) clarifying that individual units that are certified as part of a water supply and conveyance system can each request retroactive REC creation; and (3) simplifying the audit requirements for retroactive REC creation.

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CMUA appreciates the opportunity to provide these comments and urges the CEC Commissioners to adopt the proposed resolution.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Andreoni". The signature is written in a cursive, flowing style.

Anthony Andreoni, P.E.  
Director of Regulatory Affairs